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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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11 UNITED STATES OF AMERICA,  
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13 Plaintiff,  
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15 v.  
16 OLIVE TOLI,  
17  
18 Defendant.

Case No: 2:12-cr-00440-APG-GWF-9  
Case No: 2:12-cr-00451-APG-CWH

**STIPULATION TO MODIFY  
DEFENDANT OLIVE TOLI'S  
CONDITIONS OF RELEASE ON  
APPEARANCE BOND TO REMOVE  
CONDITION LIMITING HIS  
TRAVEL TO CLARK COUNTY,  
NEVADA TO ALLOW HIM TO  
TRAVEL FOR WORK AND  
REQUEST FOR TRAVEL BETWEEN  
LAS VEGAS, NEVADA AND  
ARIZONA FROM SEPTEMBER 26,  
2017-SEPTEMBER 29, 2017**

**(Expedited Review Requested)**

22 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden,  
23 United States Attorney, and Robert Knief, Assistant United States Attorneys, counsel for the  
24 United States of America, and Melanie A. Hill, counsel for defendant Olive Toli that the travel  
25 restriction condition of Olive Toli's release on appearance bond limiting his travel to Clark  
26 County [Dkt #69 in 2:12-cr-00440 and Dkt #16 in 2:12-cr-00451] be lifted to enable him to  
27 travel for work. Due to the nature of his job, Mr. Toli gets last minute jobs from his boss that  
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1 require him to travel out of state for work and Mr. Toli is requesting that this travel condition be  
2 lifted to allow him to travel outside of Clark County, Nevada.

3 Mr. Toli's boss also called him this afternoon to ask if he could travel to Arizona for  
4 work today, September 26, 2017 returning on Friday, September 29, 2017. To avoid further last  
5 minute stipulations, the parties have agreed to lift this condition of pretrial release.

6 Mr. Toli has discussed his most recent travel request with Pretrial Services and notified  
7 his pretrial services officer that he is making this travel request to travel to Arizona for work to  
8 the court.

9 DATED this 26th day of September, 2017.

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| 10<br>11<br>12<br>13<br>14 | MELANIE HILL<br>Law Office of Melanie Hill<br><br>By: /s/ Melanie A. Hill<br>MELANIE A. HILL<br><i>Attorney for Defendant Olive Toli</i> | DANIEL G. BOGDEN<br>United States of America<br><br>By: /s/ Robert Knief<br>ROBERT KNIEF<br><i>Attorney for Plaintiff</i> |
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15  
16 **ORDER**

17 IT IS HEREBY ORDERED that the travel restriction condition of Olive Toli's release  
18 on appearance bond limiting his travel to Clark County [Dkt #69 in 2:12-cr-00440 and Dkt #16  
19 in 2:12-cr-00451] is lifted to enable him to travel to Arizona for work today, September 26,  
20 2017 returning on Friday, September 29, 2017. The restriction is further lifted to allow Mr. Toli  
21 to travel without Court permission between now and his sentencing.

22 Dated: September 26, 2017.

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25 ANDREW P. GORDON  
26 UNITED STATES DISTRICT JUDGE  
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